



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

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March 17, 2021

BY CM/ECF

The Honorable Colleen McMahon  
Chief United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: *United States v. Amir Bruno Elmaani*, 20 Cr. 661 (CM)**

Dear Chief Judge McMahon:

The Government writes to respectfully request that the Court adjourn the status conference presently scheduled for March 31, 2021, and set a control date of 60 days from that date. Defense counsel joins in this request. The discovery produced in this case has been voluminous, and defense counsel would like additional time to review the discovery and discuss a potential pretrial disposition of the case with his client.

The Government requests that time be excluded through the control date under the Speedy Trial Act, 18 U.S.C. § 3161, so that defense counsel may review discovery and engage in these discussions. Defense counsel consents to the exclusion of time.

Respectfully submitted,

AUDREY STRAUSS  
United States Attorney for the  
Southern District of New York

By:       /s Margaret Graham      

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*3/18/2021*  
*OK*  
*Time excluded*  
*in consent*  
*[Signature]*